



WBGT Rochester

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RECEIVED

FCC JUL 2001

SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

DEAR SECRETARY: (REF: RM-9260) IN SUPPORT.

By way of comment regarding the petition from the Community Broadcasters Association requesting a rule making proceeding to establish a new "Class A" Television service offering to LPTV stations providing local programming protection from interference within their principal contours and from displacement, please be aware that the titans spawned by mega-owners and ultra-networks are **unable** to respond to the real needs of **individual communities**.

Stations are programmed according to **group objectives**. Even the opportunity to purchase commercial time is priced well out of the range of most **truly local businesses** as full service affiliates inflate their rates to recover revenues lost when they are forced to surrender more and more local avails to the networks who must recoup astronomical expenditures for sports and other popular programming. Similarly, as the networks clash for news supremacy within each market, editorial decisions are seldom motivated by sensitivity to the needs of the community. Local independent producers are only rarely able to get their projects aired on full service network affiliates. And job openings at most affiliated stations are filled from within the group owner's stables, or are advertised in national trade journals rather than in the local classifieds where students from regional educational facilities might readily find them.

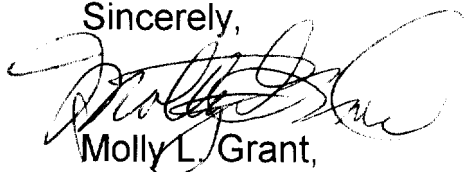
Who, then, will provide a broadcast voice for real people in real communities whose concepts just don't fit the group/network agenda? Public TV stations are similarly unable to offer access to the airwaves without first checking in with Big Business upon whose largesse they are dependent to meet the obligations of their bloated bottom lines. Taking advantage of the current feeding frenzy for frequencies, many Public TV stations are filing for changes to move translators which have served rural communities closer to

more lucrative urban centers essentially fattening them up for sale to help address deficits caused by overspending, a "legal" maneuver which creates a reality in those cast-off communities that only those who can afford Cable have access to Public TV.

But Cable does provide "access" channels..... Now that Cable competes with Broadcast for syndicated program properties as well as for eyeballs and for advertisers (while "subsidized" by subscribers) it is probably correct to consider their role in the TV universe. Cable access channels are usually offered only grudgingly and are a wasteland of mostly unwatchable inconsistency. And most Cable operators refuse to carry LPTV stations - often the last remaining **locally owned, independent BROADCASTER** in the market, forcing LPTV's viewer to perform extraordinary feats to unhook the cable so that he can be seen on the primary television set in the majority of homes in the DMA, or relegating his viewer to the set in the bedroom, kitchen, cellar, garage, How many cable systems are locally owned these days????

So FCC, while Big Business Broadcasters are admittedly better able to gratify your lusts for Digital, don't forget who brought you to the dance..... independent, local operators... nowadays the only broadcaster fitting that description is LPTV. Do whatever it takes to protect his voice - santify his contours, give him digital assignments, create a berth for him on dominant cable systems, require syndication companies to sell him available product, ... in short, maintain balance in the marketplace, or bear the responsibility for the extinction of a noble breed.

Sincerely,



Molly L. Grant,



David A. Grant